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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

WALSH SECURITIES, INC.,	:	
	:	
Plaintiff,	:	Civil Action No. 97-cv-3496 (DRD)(MAS)
	:	
vs.	:	Hon. Dickinson R. Debevoise, U.S.D.J.
	:	
CRISTO PROPERTY MANAGEMENT, LTD., a/k/a G.J.L. LIMITED; et al.,	:	
	:	
Defendants.	:	
	:	

**CERTIFICATION OF AMY WALKER WAGNER IN OPPOSITION TO
DEFENDANTS NATIONS TITLE INSURANCE OF NEW YORK, INC. AND
FIDELITY NATIONAL TITLE INSURANCE CO. OF NEW YORK'S
MOTION FOR PARTIAL SUMMARY JUDGMENT**

I, Amy Walker Wagner, of full age, upon my oath certify as follows:

1. I am a member of the Bar of this Court and an Associate in the law firm of Stone & Magnanini LLP, attorneys for Plaintiff Walsh Securities, Inc. in the above-captioned matter. I submit this Certification in support of Plaintiff's Opposition to Defendants Nations Title Insurance of New York, Inc. and Fidelity National Title Insurance Co. of New York's Motion for Partial Summary Judgment.

2. A true and correct copy of a July 28, 1997 letter from Latham & Watkins to Commonwealth Land Title Insurance Company re Claims Based on Closing Service Letters to

Walsh Securities, Inc. As Successors And/Or Assigns to National Home Funding, Inc. is annexed hereto as Exhibit 1.

3. A true and correct copy of a July 28, 1997 letter from Latham & Watkins to Kevin S. Cairns, Esq. of Fidelity National Title Insurance Company of New York re Claims Based on Closing Service Letters to Walsh Securities, Inc. As Successors And/Or Assigns to National Home Funding, Inc. is annexed hereto as Exhibit 2.

4. A true and correct copy of a July 28, 1997 letter from Latham & Watkins to Kevin S. Cairns, Esq. of Nations Title Insurance of New York, Inc. re Claims Based on Closing Service Letters to Walsh Securities, Inc. As Successors And/Or Assigns to National Home Funding, Inc. is annexed hereto as Exhibit 3.

5. True and correct copies of excerpts from the May 25, 2010 deposition of Robert Walter Skowrenski, II are annexed hereto as Exhibit 4.

6. A true and correct copy of a June 9, 1997 Assignment of Security Instrument from National Home Funding, Inc. to Walsh Securities, Inc. on 18 Ford Avenue, and a subsequent Assignment, are annexed hereto as Exhibit 5.

7. A true and correct copy of a February 28, 1996 Assignment of Mortgage from National Home Funding, Inc. to GF Mortgage Corporation on 335 Watson Avenue, and subsequent Assignments, are annexed hereto as Exhibit 6.

8. True and correct copies of excerpts from the April 9, 2010, April 23, 2010 and September 30, 2011 depositions of Robert C. Walsh are annexed hereto as Exhibit 7.

9. True and correct copies of excerpts from the June 1, 2010 deposition of Stanley Yacker are annexed hereto as Exhibit 8.

10. True and correct copies of excerpts from the August 5, 2010 deposition of Robert

Agel, Coastal Title Agency's 30(b)(6) representative, are annexed hereto as Exhibit 9.

11. True and correct copies of a chart of the following properties at issue in the present motion involving Joint Venture Deeds, and the relevant deeds, are annexed hereto as Exhibit 10:

- (A) 506 Asbury Avenue
- (B) 1324 Asbury Avenue
- (C) 1032-34 Bangs Avenue
- (D) 56 Bank Street
- (E) 181 Clerk Street
- (F) 303 Comstock Avenue
- (G) 30 Dewitt Avenue
- (H) 326 Fisher Avenue
- (I) 101 Herbert Street
- (J) 89 Jefferson
- (K) 1422 Mattison Avenue
- (L) 222 Monticello Avenue
- (M) 253A South Pearl Street
- (N) 205 River Street
- (O) 1507 Summerfield Avenue
- (P) 126 Union Avenue
- (Q) 701 First Avenue
- (R) 603 First Avenue
- (S) 612 First Avenue

(T) 305 Second Avenue

(U) 409 Sixth Avenue.

12. True and correct copies of excerpts from the September 28, 2011 deposition of Donna Sullivan, Fidelity National Title Insurance Co. of New York's 30(b)(6) representative, are annexed hereto as Exhibit 11.

13. A true and correct copy of a February 5, 199 Order granting Plaintiffs' Motion for Summary Judgment and Default Judgment in the matter entitled *Bustos, Sr., et al. v. Cristo Property Management, Ltd.*, Docket No.: MONC-240-98, filed in the Superior Court of New Jersey, Monmouth County Chancery Division, is annexed hereto as Exhibit 12.

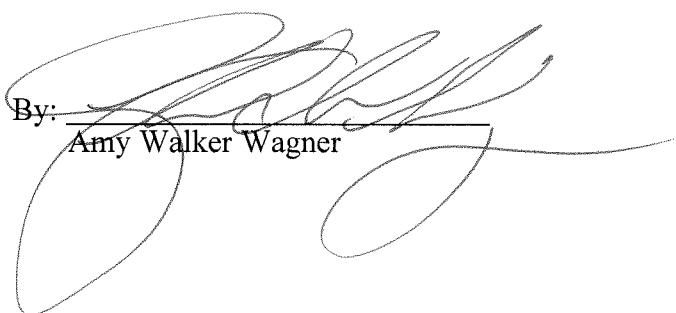
14. A true and correct copy of an October 20, 2000 Order granting Plaintiffs' Motion An Order Awarding Damages in the matter entitled *Cityscape Corp. v. Walsh Securities, Inc.*, Docket No.: 98-Civ.-223, filed in the United States District Court for the Southern District of New York, is annexed hereto as Exhibit 13.

I hereby certify that the above facts are true to the best of my knowledge. I understand that I am subject to punishment if any of the above facts are willfully false.

Dated: December 22, 2011

By:

Amy Walker Wagner

A handwritten signature in black ink, appearing to read "Amy Walker Wagner", is written over a stylized, flowing line that serves as a underline.